

EXHIBIT D

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2 -----X
ADRIAN SCHOOLCRAFT,

3
4 -against- PLAINTIFF,
Case No:
10 Civ. 6005
5 (RWS)

6 THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO,
Tax Id. 873220, Individually and in his Official
7 Capacity, ASSISTANT CHIEF PATROL BOROUGH BROOKLYN
NORTH GERALD NELSON, Tax Id. 912370, Individually
8 And in his Official Capacity, DEPUTY INSPECTOR
STEVEN MAURIELLO, Tax Id. 895117, Individually and
9 In his Official Capacity, CAPTAIN THEODORE
LAUTERBORN, Tax Id. 897840, Individually and in his
10 Official Capacity, LIEUTENANT WILLIAM GOUGH, Tax Id.
919124, Individually and in his Official Capacity,
11 SGT. FREDERICK SAWYER, Shield No. 2576, Individually
and in his Official Capacity, SERGEANT KURT DUNCAN,
12 Shield No. 2483, Individually and in his Official
Capacity, LIEUTENANT CHRISTOPHER BROSCART, Tax Id.
13 915354, Individually and in his Official Capacity,
LIEUTENANT TIMOTHY CAUGHEY, Tax Id. 885374,
14 Individually and in his Official Capacity, SERGEANT
SHANTEL JAMES, Shield No. 3004 and P.O.'s "JOHN DOE"
15 #1-50, Individually and in their Official Capacity
(the name John Doe being fictitious, as the true
16 names are presently unknown) (collectively referred
to as "NYPD defendants"), JAMAICA HOSPITAL MEDICAL
17 CENTER, DR. ISAK ISAKOV, Individually and in his
Official Capacity, DR. LILIAN ALDANA-BERNIER,
18 Individually and in her Official Capacity and
JAMAICA HOSPITAL MEDICAL CENTER EMPLOYEE'S "JOHN
19 DOE" # 1-50, Individually and in their Official
Capacity (the name John Doe being fictitious, as
20 The true names are presently unknown),

21 DEFENDANTS.

22 -----X

23 DATE: October 11, 2012

24 TIME: 10:20 A.M.

25 (Continued ...)

A. SCHOOLCRAFT

1 assumed that it might have happened, or what would happen.

2 Q. Do you have an e-mail account?

3 A. Yes.

4 Q. What is your e-mail account?

5 MR. NORINSBERG: Objection.

6 A. Schoolcraft@gmail.com, S-C-H-O-O-L-C-R-A-F-T at
7 gmail.com.

8 Q. Have you sent any e-mails regarding this
9 incident?

10 A. Regarding this incident?

11 Q. Have you sent any e-mails regarding the
12 allegations complained of in your Complaint?

13 A. I don't recall sending any e-mails.

14 Q. Have you ever written online, with regard to the
15 events alleged in your Complaint?

16 A. What do you mean by writing online?

17 Q. Have you ever written for any online publication
18 about the incident alleged in your Complaint?

19 A. I haven't written anything online. There were
20 media -- I have been to the media since October 31, 2009.

21 Q. How many times have you spoken to the media since
22 October 31, 2009?

23 A. Approximately six or seven times; maybe more,
24 maybe less.

25 Q. Have you written down any account of the events

A. SCHOOLCRAFT

1 alleged in your Complaint or the injuries you are claiming
2 as a result of those events alleged in your Complaint?

3 MR. NORINSBERG: Objection.

4 A. To the best of my memory, the Complaint is the
5 most detailed account that was prepared by my attorneys.

6 Q. Have you ever prepared an account of what
7 happened?

8 A. I don't believe so, no.

9 Q. Have you made any audio or video recordings of
10 statements, regarding the events alleged in your Complaint?

11 MR. NORINSBERG: Objection.

12 A. There were recordings in the Complaint.

13 Q. Since October 31, 2009, have you made any audio
14 or visual recordings of your statements, recounting what
15 happened on October 31, 2009?

16 MR. NORINSBERG: Objection.

17 A. There was one -- This American Life, that was a
18 radio show. I didn't produce the recording, I didn't make
19 a recording of it myself. It was a show.

20 Q. When did you first go to the media about your
21 allegations of downgrading crime and alleged quotas?

22 A. I believe it was early 2010.

23 Q. How early in 2010?

24 A. I don't recall. Maybe it was late 2009, some
25 time in that time frame.